

3. Student Confidentiality and Privacy Policy

Last updated: December 1, 2018

1. Purpose of Policy

Babel University Professional School of Translation (the School) intends to treat the privacy of its students seriously as a matter of respect for each student's fundamental right to privacy of their personal information. This Student Privacy Policy serves to outline the School's commitment to privacy and to ensure high standards of confidentiality and security of students' information.

2. Scope of Policy

This Policy deals with the collection, retention, use, disclosure, security and access to students personal information. It applies to all students including regular students and coursework students who study at the School and higher degree candidates who are involved in research at the School (the Student).

3. Collection and Retention

- 1) The School collects students' personal information (Personal Information) in order to assist the provision of its services of education and training to students. Personal Information will not be collected unless it is relevant for a purpose related to a function or activity of the School. No Personal Information will be collected by unlawful or unfair means.
- 2) Where the School collects Personal Information for inclusion in a record, the School will take all reasonable steps to ensure that each individual of students is made aware of the purpose for which the information is being collected.
- 3) Details of Personal Information are collected for the purposes of the following:
 - processing enrollments and inquiries;
 - communicating accurately with students;
 - matching courses with students' needs;
 - dispatching course information;
 - enrollment procedures;
 - delivering course texts, lectures, instructions, questions and answers and other materials;
 - managing record keeping;
 - managing students' account details;
 - compiling statistics and market research.
- 4) The School will ensure that the collection of Personal Information does not intrude to an unreasonable extent upon the personal affairs of the individual concerned and that information collected is up to date and complete.
- 5) The School websites may use cookies and IP address data in order to collect information regarding website usage; IP addresses are not matched with Personal Information.

- 6) Personal Information is retained in data storage of the School's computers.

4. Use and Disclosure

- 1) The School acknowledges and respects the privacy of Personal Information.
- 2) The School uses Personal Information only for the purpose that it was collected in order to provide students with the School's education and training services, to communicate with students, faculty members and instructors, and staff, and to communicate with nominated people in the event of an accident or emergency.
- 3) The School does not provide Personal Information to external third party companies for the purpose of commercial use, provided, however, that the School may provide Personal Information to the affiliated companies, namely, Babel K.K. (Co., Ltd.) for the benefit of students receiving useful information and services from them.
- 4) The School also collects statistical information in order to improve the level of service provision, provided, however, that none of this information may be directly attributable to any individual of students.
- 5) The School may be required to provide Personal Information to external organization such as The Distance Education Accrediting Commission (DEAC), Council for Higher Education Accreditation (CHEA), US Department of Education (DOE), and other designated authorities in order to provide specific services and as required by law. The School may do so if required.
- 6) The School may disclose information of a student who violates the School's rules and disciplines including Policy on Student Integrity and Academic Honesty.
- 7) Personal Information will not be disclosed to a third party, other than as described above, without the written consent of individual concerned. Students wishing to authorize the School to release their Personal Information to third party (ies) shall submit a student authority to release information form to the School.

5. Quality of Data

The School relies on students to advise of change in Personal Information in order to maintain complete, accurate and up-to-date records. The School will ensure that records are accurate, up-to-date, complete, and not misleading. The School requests updated information from students as the enrollment procedure.

6. Access and Correction

- 1) All students have the right to access to and inspect their own Personal Information held by the School free of charge. An individual may apply to receive a copy of their Personal Information held by the School. The School may charge a nominal fee for this service. Personal Information of

students cannot be released to parents, partners or any other external party without the student's written consent. Disclosure to a third party will only be granted after receiving written permission.

- 2) If a record is found to be inaccurate, a correction will be made. Where an individual requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment are noted on the record.

7. Complaints

Any and all complaints regarding a privacy matter of Personal Information will be handled by Educational Director of the School.

8. Notice of Rights under FERPA

The Family Educational and Privacy Act (FERPA) affords students certain rights to protect their privacy with respect to students' education records. These rights include the following:

- 1) BUPST shall investigate the student's grades within forty five (45) days after receiving a request from a student.

Students must submit a written request specifying their own grades to be investigated to the Student Service, or other BUPST staff, Vice Chancellor or Chancellor. BUPST shall set up such student with an interview with the applicable BUPST staff, the Student Service, Vice Chancellor and Chancellor to investigate his/her grades, and notify the student of the date and time of the investigation. If a BUPST staff member who did not engage in grading has received an investigation request from a student, such BUPST staff member shall inform such student of the correct person to whom the request is to be submitted.

- 2) Right to request for correction of a grade transcript that students consider inaccurate and incorrect.

Students may request BUPST to correct their grade transcripts that appear to be inaccurate and incorrect. Students must submit a document specifying the part to be corrected and the reason why it is inaccurate and incorrect. If the BUPST decides not to correct the grade against the student's request, BUPST shall notify the student of such decision and inform that he/she has the right to demand for a public hearing on his/her correction request. In addition, the student will be informed more about the procedures for the hearing as well.

3) Right to agree on disclosure of Personal Information included in students' education records except for cases where FERPA permits disclosure without consent.

Disclosure of students' results without any consent to university staff with legitimate educational views is permitted as an exception. In this case, "staff" refers to employees employed by BUPST, managers, supervisors, staff members such as clerical workers (including personnel and health management staff), educators or researchers, individuals or companies having a contractual relationship with BUPST (lawyers, corporate auditors or creditors), board members, students who engage in tasks of public committees such as disciplinary committees or complaints processing committees, or students who assist staff as their jobs. If staff needs to confirm students' education records in order to fulfill their responsibilities, such staff shall do it in accordance with their legitimate educational views. Upon request, BUPST will disclose the education record of a student who wishes to enter to another school without any consent from staff of such school.

4) Right to make a claim to satisfy FERPA's requirements

Students shall have the right to make a claim to the managing organization of FERPA if the claim meets FERPA's requirements. The managing organization of FERPA is as follows:

Family Policy Compliance Office US Department of Education

400 Maryland Avenue, SW Washington D.C. 20202-5920

(Phone 1-800-872-5327)